

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

1<sup>st</sup> ROCHDALE COOPERATIVE GROUP, LTD.

Debtor.

ROBERT L. GELTZER, as Chapter 7 Trustee for 1<sup>st</sup>  
ROCHDALE COOPERATIVE GROUP, LTD.,

Plaintiff,

v.

GARY ALTMAN, RHODA BROWN, "JOHN DOE 1"  
AS EXECUTOR OR ADMINISTRATOR OF THE  
ESTATE OF GEORGE CRETHAN, SAUL  
MILDWORM, JACK RASKIN, DAVID SMITH,  
FRANCIS CONNOLLY and JOAN RAMER AS  
EXECUTORS OF THE ESTATE OF ALLEN  
THURGOOD, EDWARD YAKER, GREGORY  
WORTHAM and DAVID L. JOHNSON,

Defendants.

Bankruptcy Proceeding Chapter 7  
Case No. 05-12086 (PCB)

**07 CV 7852 (DC)**

**ECF Case**

**DEFENDANTS JOAN RAMER AND FRANCIS CONNOLLY, AS  
CO-EXECUTORS OF THE ESTATE OF ALLEN THURGOOD,  
INITIAL DISCLOSURES PURSUANT TO RULE 26, F.R.C.P.**

Defendants Joan Ramer and Francis Connolly, as co-executors of the Estate of Allen Thurgood (the "Estate of Thurgood"), by their attorneys, Haynes and Boone, LLP, for their Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, state as follows:

**F.R.C.P. 26(a)(1)(A)(i):**

The following individuals are likely to have discoverable information:

**Robert L. Geltzer, Esq.**  
1556 Third Avenue  
Suite 505  
New York, New York 10128

**Gary Altman**  
572 Grand Street  
New York, New York 10002

**Rhoda Brown**  
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**Saul Mildworm**  
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**Jack Raskin**  
305 W. 28<sup>th</sup> Street  
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**David Smith**  
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**Edward Yaker**  
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**Gregory L. Wortham**  
311 E. Avenue C  
Sweetwater, Texas 79556

**David L. Johnson**  
2 Highview Avenue  
Bernardsville, New Jersey 07924

**F.R.C.P. 26(a)(1)(A)(ii):**

The Estate of Thurgood is in possession of approximately 100 pages of documents comprised of bank records, corporate resolutions, internal memoranda, and various correspondence relating to the business affairs of 1<sup>st</sup> Rochdale Cooperative Group, Ltd. Upon information and belief, the majority of documents relating to the subject matter of this action are in the possession, custody or control of plaintiff.

**F.R.C.P. 26(a)(1)(A)(iii):**

Not applicable.

**F.R.C.P. 26(a)(1)(A)(iv):**

Not applicable.

**F.R.C.P. 26(a)(2):**

The Estate of Thurgood has yet to retain an expert witness in connection with this matter. The Estate of Thurgood will provide disclosure in accordance with the Federal Rules of Civil Procedure if, and when, it retains an expert.

This disclosure may be supplemented, revised or modified during the course of this action and shall be deemed supplemented, revised or modified by further disclosures made by the Estate of Thurgood during the course of this action, including during discovery.

Dated: July 11, 2008

HAYNES and BOONE, LLP  
*Attorneys for Defendants Joan Ramer and  
Francis Connolly, as co-executors of the  
Estate of Allen Thurgood*

By: /s/ Jonathan D. Pressment  
Kenneth J. Rubinstein (KR-1410)  
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To: ECF Distribution List